

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

HEATHER NELSON,

Plaintiff,

v.

Case No.: 11-cv-307

SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC.,
d/b/a AMERICAN RECOVERY SERVICE,
ASSETSBIZ CORP. d/b/a ABC RECOVERY,

Honorable Barbara B. Crabb

Defendants.

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION IN LIMINE NUMBER 11:
TO PRECLUDE DEFENDANTS FROM USING
IMPROPER AND PREJUDICIAL TACTICS AGAINST PLAINTIFF'S MOTIVES**

Defendant Santander Consumer USA, Inc., Patrick K. Willis Co., Inc., d/b/a American Recovery Service, and AssetsBiz Corp. d/b/a ABC Recovery ("Defendants"), by their attorneys, respectfully submit this Response to plaintiff Heather Nelson's Motion *in Limine* Number 11 which seeks an order to "preclude defendants from using improper and prejudicial tactics against plaintiff's attorneys' motives." [See D.E. #196].

In short, Defendants do not believe they can properly respond to Plaintiff's Motion, and thus must oppose it, because it is vague as to what information/arguments it is seeking to preclude from being presented to the jury. Nowhere does Plaintiff sufficiently define what "improper and prejudicial tactics" she is seeking to preclude with her Motion. Plaintiff does not provide a single example of what line of argument or "tactics" she is seeking to preclude in her Motions. Accordingly, the Court should deny Plaintiff's vague Motion *in Limine* Number 11.

Dated: May 24, 2013

SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC., d/b/a
AMERICAN RECOVERY SERVICE
AND ASSETSBIZ CORP., d/b/a/ ABC
RECOVERY

Defendants

s/ David Z. Smith

David. Z. Smith

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CERTIFICATE OF SERVICE

I, David Z. Smith, hereby state that on May 24, 2013, I electronically filed the foregoing **DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION IN LIMINE NUMBER 11** with the Clerk of the U.S. District Court for the Western District of Wisconsin using the ECF system, which will send notification to all parties of record.

By: /s/ David Z. Smith
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